



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

05 MAY 1989

Robert P. Harris Harold A. Harris, Ltd. Suite 740 29 South LaSalle Street Chicago, Illinois 60603-1560

Re: U.S. Scrap Site Chicago, Illinois

Dear Mr. Harris:

This will respond to your correspondence of March 21, 1989 on behalf of your client Crown Cork & Seal. As a preliminary matter, please be advised that all Freedom of Information Act requests must be directed to Robert Hartian, the Freedom of Information Act Officer, at the above address.

By way of an informal response to your request for information linking your client to the U.S. Scrap Site, please be advised that the Agency has the following information linking your client to the U.S. Scrap Site:

- -- The unsworn statement of Site Operator Steve Martell, taken May 24, 1988;
- -- The deposition of Steve Martell, taken November 21 and 22, 1988;
- -- The deposition of Leroy Brown, former Martell employee, taken September 9, 1988;
- -- The deposition of Robert Thompson, former Martell employee, taken August 18, 1988;
- -- The deposition of Lynn Tyree, former Martell employee, taken September 21, 1988;
- --A customer list sold by Martell to Liquid Waste in January 1976;

These materials have previously been provided to the Steering Committee for the Site, and review of them can probably be arranged through contacting Ms. Pamela Nehring at (312) 245-8491. They can also be reviewed at our office by contacting Mr. Mark Thomas at (312) 886-7936.